

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
-----X	:	

**COUNTERDESIGNATION OF THE CITY OF DETROIT IN
RESPONSE TO AFSCME COUNCIL 25 AND ITS AFFILIATED
DETROIT LOCALS' DESIGNATION OF THE CONTENTS
OF THE RECORD AND STATEMENT OF ISSUES ON APPEAL**

The City of Detroit, Michigan (the "City") hereby files this Counterdesignation pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, in response to AFSCME Council 25 and Its Affiliated Detroit Locals' Designation of the Contents of the Record and Statement of Issues on Appeal (Docket No. 8274) (the "Designation") filed on November 12, 2014 by AFSCME Council 25 and Its Affiliated Detroit Locals ("AFSCME").¹ For its Counterdesignation, the City states as follows:

¹ The City reserves all of its rights with respect to any attempt by AFSCME, through the Designation, to supplement the record on appeal in this matter.

**COUNTERDESIGNATION OF ITEMS
TO BE INCLUDED IN THE RECORD ON APPEAL²**

Item Number	Docket Number (if applicable)	Date	Description
1	1782	11/21/2013	Order, Pursuant to Sections 105, 501 and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof
2		2/21/2014	Proof of claim number 2958
3	4421	5/6/2014	Certificate of Service
4	4961	5/20/2014	Certificate of Service
5	7235	9/2/2014	Creditor Michigan AFSCME Council 25 and Its Affiliated Detroit Locals' Response to Debtor's Objection to Proofs of Claim (Docket Number 2958)
6	7502	9/16/2014	Seventh Amended Chapter 9 Plan for the Adjustment of Debts of the City of Detroit
7	7557	9/17/2014	Certificate of Service
8	7877	10/8/2014	Order Dismissing Claims from Mediation

² The items designated herein by the City include all exhibits, attachments, certificates of service and other papers included within the docket entry for each item.

Item Number	Docket Number (if applicable)	Date	Description
9	7981	10/16/2014	Supplemental Brief of the City of Detroit in Support of Objection of the City of Detroit, Pursuant to Sections 105 and 502(B) of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1, to Proof of Claim Number 2958 Filed by Michigan AFSCME Council 25 and Its Affiliated Detroit Locals
10	8336	11/19/2014	Transcript of hearing held on October 17, 2014
11	8003	10/18/2014	Corrected Reply in Support of Objection to Proof of Claim Number 2958 Filed by Michigan AFSCME Council 25 and Its Affiliated Detroit Locals
12	8015	10/20/2014	Order Regarding City's Objection to Proof of Claim #2958 Filed by AFSCME Council 25 and its Affiliated Detroit Locals (Dkt. #4876)
13	8020	10/20/2014	Certificate of Service
14	8031	10/21/2014	Transcript of hearing held on October 20, 2014
15	8045	10/22/2014	Eighth Amended Plan for the Adjustment of Debts of the City of Detroit
16	8061	10/22/2014	Certificate of Service
17	8091	10/24/2014	Certificate of Service
18	8118	10/27/2014	Certificate of Service

Item Number	Docket Number (if applicable)	Date	Description
19	8272	11/12/2014	Order Confirming Eighth Amended Plan for the Adjustment of Debts of the City of Detroit
20	8321	11/17/2014	Certificate of Service

The City reserves all of its rights with respect to this appeal.

Dated: November 26, 2014

Respectfully submitted,

/s/ Heather Lennox

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ATTORNEYS FOR THE CITY

CERTIFICATE OF SERVICE

I, Heather Lennox, hereby certify that the foregoing Counterdesignation of the City of Detroit in response to AFSCME Council 25 and Its Affiliated Detroit Locals' Designation of the Contents of the Record and Statement of Issues on Appeal was filed and served via the Court's electronic case filing and noticing system on this 26th day of November, 2014.

/s/ Heather Lennox